

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor C. Stephen Allred, Director

March 14, 2003

Certified Mail No. 7099 3220 0009 1976 1029

Mr. Shawn Luteyn Chief Operations Officer Interstate Group LLC 224 Carnation Drive Nampa, ID 83687

RE:

AIRS Facility No. 027-00084, Interstate Group LLC, Nampa

Final Tier II Operating Permit and Permit to Construct

Dear Mr. Luteyn:

The Department of Environmental Quality (Department) is issuing Tier II Operating Permit and Permit to Construct No. 027-00084 for the Interstate Group LLC, in accordance with the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 - 470 and 58.01.01.200 - 228, respectively.

The enclosed permit is effective immediately and is based on the information contained in your permit application and all relevant comments received during the public comment period.

A representative of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Stepen E. West, Administrator

Air Quality Division

Enclosure

SEW/CZ/sd

Project No. T2-010717

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cc: Mike McGown, Boise Regional Office Sherry Davis, Technical Services Laurie Kral, EPA Region 10 Mike Simon Carole Zundel Marilyn Seymore (PBF) Joan Lechtenberg (PC) Pat Rayne Reading File (Ltr only)



Air Quality TIER II OPERATING PERMIT and **PERMIT TO CONSTRUCT**

State of Idaho

Department of Environmental Quality

PERMIT NO.: 027-00084

AQCR: 64

CLASS: SM

SIC:

3715

ZONE: 11

UTM COORDINATE (km): 537.4, 4826.1

1 PERMITTEE

Interstate Group LLC

2. PROJECT

Tier II operating permit and permit to construct

Tier is operating positive and positive w	<i>5</i>		
3. MAILING ADDRESS	CITY	STATE	ZIP
224 Carnation Drive	Nampa	ID	83687
4. FACILITY CONTACT	TITLE	TELEPHONE	
Shawn Luteyn	Chief Operations Officer	(208) 466-6777	7
5. RESPONSIBLE OFFICIAL	TITLE	TELEPHONE	
Shawn Luteyn	Chief Operations Officer	(208) 466-6777	7
6. EXACT PLANT LOCATION		COUNTY	
224 Carnation Drive, Nampa		Canyon	

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Cargo trailer assembly and finishing

8. PERMIT AUTHORITÝ

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment and will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200.

C. STEPHEN ALLRED, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:

March 14, 2003

DATE EXPIRES

March 14, 2008

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR Air Quality Control Region

CO carbon monoxide

Cr chromium

Department of Environmental Quality
EPA Environmental Protection Agency

HAPs Hazardous Air Pollutants
HVLP high-volume, low-pressure

IDAPA A numbering designation for all administrative rules in Idaho promulgated in accordance with the

Idaho Administrative Procedures Act

km kilometer
lb/day pounds per day
lb/mo pounds per month

MMBtu million British thermal units

Mn manganese Ni nickel

NO_x nitrogen oxides

O&M operations and maintenance

PM particulate matter

PM₁₀ particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

PTE potential to emit

SIC Standard Industrial Classification

SM Synthetic Minor
SO₂ sulfur dioxide
T/mo Tons per month
T/yr tons per year

UTM Universal Transverse Mercator VOC volatile organic compound

Permittee: Interstate Group LLC

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Location:

Nampa, Idaho

Date Expires:

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1. PERMIT SCOPE

Purpose

1.1 The purpose of this permit is to establish to establish federally enforceable limits necessary to exempt the facility from Title V permitting requirements and to demonstrate the facility's compliance with ambient air quality standards for criteria pollutants.

Regulated Sources

1.2 Table 1.1 lists all sources of emissions regulated in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Sections	Source Description	Emissions Control(s)
3	Xylene trailer cleaning	None
3	Painting operations inside paint booth HVLP spray gun	Paint booth, including arrestor filter pads for particulate matter control
3	Undercoat painting outside building Airless spray equipment	None
3	Other sealants, adhesives, coatings	None

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Location: Nampa, Idaho **Date Expires:**

FACILITY-WIDE CONDITIONS 2.

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
 - Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of dirt roads. material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans and fabric filters, or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical,
 - Prompt removal of earth or other stored material from streets, where practical.
- The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, 2.2 chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Odors

- 2.4 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.5 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include. at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

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Visible Emissions

2.6 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, or chlorine gas are the only reason for the failure of the emission to comply with the requirements of this section.

Excess Emissions

2.7 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.

Open Burning

2.8 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

Air Stagnation Advisory Days

2.9 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550 - 562.

Monitoring and Recordkeeping

2.10 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to Department representatives upon request.

Reports and Certifications

2.11 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following:

Air Quality Permit Compliance Department of Environmental Quality Boise Regional Office 1445 N. Orchard Boise, ID 83706-2239

Phone: (208) 373-0550

Fax: (208) 373-0287

Permittee:

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Obligation to Comply

2.12 Receiving a Tier II operating permit and permit to construct shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.

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3. PAINT, COATINGS, ADHESIVES, SOLVENTS, AND CLEANERS

3.1 Process Description

Trailers are welded, cleaned with xylene, painted in a paint booth, then finished with plywood floor and interior surfaces, trim, and an undercoat is applied.

3.2 Control Description

Emissions from trailer cleaning are uncontrolled. Emissions from painting are controlled by the use of an enclosed paint booth. Emissions from undercoating are controlled by a partial enclosure.

Table 3.1 PAINT, COATINGS, ADHESIVES, SOVENTS, AND CLEANERS USE

Emissions Unit(s) / Process(es)	Emissions Control Device
Xylene trailer cleaning	None
Painting operations	Paint booth with filters
Undercoat painting	Partial enclosure
Other sealants, adhesives, coatings	None

Emissions Limits

3.3 Emissions Limits

- Total VOC emissions from the sources listed in Table 3.1 shall not exceed 2.97 T/mo or 35.6 tons per any consecutive 12-month period.
- Total HAP emissions from the sources listed in Table 3.1 shall not exceed 1.50 T/mo or 18.0 tons per any consecutive 12-month period.
- Total emissions of any single HAP from the sources listed in Table 3.1 shall not exceed 0.83 T/mo or 9.88 tons per any consecutive 12-month period.
- The PM and PM₁₀ emissions from the paint booth shall not exceed 11 lb/day or 1.1 tons per any
 consecutive 12-month period.

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Operating Requirements

3.4 The VOC emissions shall be calculated using the following equation:

$$VOC = \sum_{i=1}^{n} (X_i \times Y_i)$$

Where:

VOC = Emissions of VOC per month and/or year (lb/mo, T/yr)

n = Number of compounds used

X_i = Usage of compound i per month and/or year (lb/mo, T/yr)

Y_i = Weight percent of VOC contained in compound i

3.5 The HAP emissions shall be calculated using the following equation:

$$HAP = \sum_{i=1}^{n} (X_i \times Y_i)$$

Where:

HAP = Emissions of HAP per month and/or year (lb/mo, T/yr)

n = Number of compounds used

 X_i = Usage of compound i per month and/or year (lb/mo, T/yr)

Y_i = Weight percent of HAP contained in compound i

3.6 The PM and PM₁₀ emissions shall be calculated using the following equation:

$$PM = \left(\sum_{i=1}^{n} [i \times p]\right) \times 0.55 \times 0.15$$

Where:

PM = Emissions of particulate matter (or PM₁₀) per day or per year (lb/day, T/yr)

i = Usage of compound i per day and/or per year (lb/day, T/yr)

n = Number of compounds used

p = percent solids by weight in compound i (% solids)

0.55 = 45% transfer efficiency

0.15 = 85% filter efficiency

Note: Compound refers to any paint, adhesive, solvent, or any other solids containing chemical.

- 3.7 The permittee shall maintain a filter system to control particulate generated in the paint booth. The filter systems shall have a minimum average paint removal efficiency of 85%.
- 3.8 The permittee shall install a manometer on the paint booth to measure the pressure drop across the filter system within 30 days of issuance of this permit.
- 3.9 The pressure drop across the filter system shall be maintained within manufacturer and O&M manual specifications.

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3.10 Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment used to control PM emissions from the paint booth. The O&M manual shall specify the maintenance requirements for the filter pads. The O&M manual shall be maintained on site at all times and shall be made available to Department representatives upon request.

3.11 The undercoat painting operation shall be performed inside a building enclosed on at least three sides.

Monitoring and Recordkeeping Requirements

- 3.12 The permittee shall maintain daily records, for paints, coatings, adhesives, solvents, and VOC-containing cleaners used at the facility. The records shall contain, but not be limited to, the following information: material name and identification number, manufacturer, VOC percent by weight, each HAP percent by weight and, for paints and coatings used in the paint booth, solids percent by weight
- 3.13 The permittee shall calculate the daily average solids percent by weight of all solids-containing paints and coatings used in the paint booth. The permittee shall also calculate the total daily emissions of PM and PM₁₀. The permittee shall calculate the total monthly and total 12-month-rolling-average annual emissions of VOCs and HAPs from all paints, adhesives, solvents, and other chemicals used at the facility.
- 3.14 The permittee shall record the pressure drop across the paint booth filter system once on a daily basis when paint booth is in operation. On days when the paint booth is not in operation, pressure drop measurements are not required.

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4. SUMMARY OF EMISSION RATE LIMITS

Table 4.1 lists the emissions limits for the facility.

Table 4.1 SUMMARY OF ALL EMISSION RATE LIMITS IN THE TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT

Interstate Group, Nampa Emission Limits* – Daily (lb/day), Monthly (T/mo), and Annual ^b (T/yr)										
Source Description	PM		PM ₁₀ ^C		VOC		Total HAP		Any One HAP	
	lb/day	T/yr	lb/day	Т/ут	T/mo	T/yr	T/mo	T/yr	T/mo	T/yτ
Paints, coatings, adhesives, and cleaners (facility-wide)		***	Mar Nov.		2.97	35.6	1.50	18.0	0.83	9.88
Paints and coatings in paint booth (particulate emissions)	11	1,1	11	1.1						

As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^c includes condensables.

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5. FACILITY-WIDE EMISSIONS INVENTORY

The emissions inventory table includes all potential emissions from all sources at the facility. The emissions inventory table is provided for informational purposes only.

Table 5.1 EMISSION INVENTORY BASED ON PTE

	PM/PM ₁₀		tential Emissio		CO I		SO ₂		l voc		Single HAF		Total HAPs	
Source Description	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	Т/уг	lb/hr	T/yr	lb/hr	T/yr
Welding operations	0.076	0.33				-	.==	-					0.005	0.02
Paints, coatings, adhesives, and solvents (facility-wide)	#-					**		*-	2.97	35.6	0.83	9.88	1.50	18.0
Paints and coatings in paint booth (particulate emissions)	0.9	1.1				**	-	***					-	
Undercoat application (particulate emissions)	0.49	2.1		-		***		**		-				
Air makeup unit; 1.33 MMBtu, direct-fired, natural gas	0.01	0.04	0.13	0.57	0.11	0.47	8 E-4	0.004	0.007	0.03	wm		0.004	0.018
Total	1.48	3.57	0.13	0.57	0.11	0.47	8 E-4	0.004	2.98	35.63	0.83	9.88	1.51	18.0

^a As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

Table 5.1 (continued) EMISSION INVENTORY BASED ON PTE

InterstateGroup, Nampa Potential Emissions ^a – Hourly (lb/hr) and Annual (T/yr)												
Source Description	Cr		Mn		Ni		Ethyl benzene		Ethylene glycol		Hexane	
	lb/hr	T/yr	lb/hr	Т/уг	lb/hr	T/yr	lb/hr	T/yr	lb/hr	Т/уг	lb/hr	T/yr
Welding operations	1.46E-5	6.4E-5	5E-3	2.2E-2	1.46E-5	6.4E-5	5 -					
Paints, coatings, adhesives, solvents, and fugitives (facility-wide)		<u> </u>		4444	++	-	1.86	8.15	0.12	0.53	0.01	0.04
Air makeup unit; 1.33 MMBtu, direct-fired, natural gas		ala-da.		alle die	**		**		46 10	44 4	0.0039	0.017
Total	1.46E-5	6.4E-5	5E-3	2.2E-2	1,46E-5	6.4E-5	1.86	8.15	0.12	0.53	0.014	0.057

As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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Table 5.1 (continued) EMISSION INVENTORY BASED ON PTE

	Intersta	te Group, Nam	38
Potential	l Emissions" –	Hourly (lb/hr)	and Annual (T/yr)

Source Description	Toluene Xylene				Formal	dehyde	Methylene diphenyl isocyanate		n-Butyl alcohol	
Printer and the second	lb/hr	T/yr	lb/hr	T/yr	lb/hr	Т/уг	lb/hr	T/yr	lb/hr	T/yr
Paints, coatings, adhesives, solvents, and fugitives (facility-wide)	4.8	9.88	8.23	9.88	_		0.014	0.06	0.01	0.04
Air makeup unit; 1.33 MMBtu, direct-fired, natural gas			**		0.0002	0.0009		-	**	
Total emissions	4.8	9.88	8.23	9.88	0.0002	0.0009	0.014	0.06	0.01	0.04

As determined by a pollutant-specific U.S. EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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6. OTHER SOURCES

Table 6.1 identifies other air pollution-emitting activities at the facility that do not require specific permit conditions to demonstrate compliance with applicable air quality standards.

Table 6.1 OTHER AIR POLLUTION SOURCES AT THE FACILITY.

Source Description							
Welding operations							
Air makeup unit; 1.33 MMBtu, direct-fired, natural gas							

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7. GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et seq.

- 2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
 - To enter upon the permittee's premises where an emissions source is located, or in which any records
 are required to be kept under the terms and conditions of this permit; and
 - At reasonable times, to have access to and copy any records required to be kept under the terms and
 conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack
 emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA
 procedures when deemed appropriate by the Director.
- 4. Except for data determined to be confidential under Section 9-342A Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 5. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- 6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
- 7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
- 8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference; and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.